

NOTICE OF EMERGENCY AMENDED PETITION FOR WRIT OF HABEAS CORPUS
AND INJUNCTIVE RELIEF

However, undersigned counsel have now been engaged by one of the petitioners, Mr. Espinal Alvarado, for purposes of this action. Counsel are consequently submitting evidence and legal argument into the record of this action. Although this information is being submitted on Mr. Espinal Alvarado's behalf, counsel respectfully suggest that the evidence and argument, which is now part of the record, may aid the Court in its consideration of the other 64 claims. If the Court determines that this amended petition should be severed into a separate action and

assigned a separate docket number, counsel respectfully suggest that treating such action as in some fashion consolidated with or related to the existing action may serve the interests of justice and judicial economy.

To be clear, this amendment is filed for Mr. Espinal Alvarado only, and does not modify, supersede, or dismiss any claims brought by the other 64 petitioners.

Dated: April 13, 2020

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*pro hac application forthcoming

**pro hac application forthcoming; not admitted in D.C.; practice limited to federal courts